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8 **Attorneys for Defendant**  
9 **GARY GOULIN**

10  
11 UNITED STATES DISTRICT COURT  
12 CENTRAL DISTRICT OF CALIFORNIA  
13

11 THE UNITED STATES OF	}	<b>CASE NO.: 22-CR-00476-MEMF</b>
12 AMERICA,		
13 Plaintiff,		
14 vs.		
15 GARY GOULIN,		
16 Defendant	}	<b><i>EX PARTE</i> APPLICATION TO ALLOW DEFENDANT GARY GOULIN TO TRAVEL TO MINNESOTA; [PROPOSED] ORDER</b>

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18 Defendant Gary Goulin, by and through his counsel, Mark J. Werksman,  
19 hereby applies *Ex Parte* to be allowed to travel to Minneapolis and Rochester,  
20 Minnesota.

21 1. Dr. Goulin would travel from Los Angeles, California on September  
22 30 through October 10, 2023 to Minneapolis, Minnesota and Rochester, Minnesota  
23 to be present for his 84-year-old mother's scheduled surgery at the Mayo Clinic in  
24 Rochester, Minnesota, to correct her achalasia, a disorder of the esophagus and to  
25 provide post-operative care for her for several days afterwards;

26 2. Dr. Goulin will be staying with family in Minneapolis, Minnesota and  
27 will travel between a hotel in Minneapolis and the Mayo Clinic in Rochester,  
28 Minnesota, during this time period;

1           3.     All other terms of Mr. Goulin's pre-trial release shall remain intact,  
2 including observing curfew restrictions and electronic monitoring;

3           4.     Dr. Goulin shall provide 24-hour advance notice to Pre-trial Services  
4 with a complete itinerary prior to departure, and report to Pre-trial Services within  
5 48 hours of his return to Los Angeles;

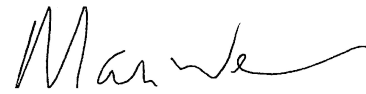
6           5.     Dr. Goulin has fully complied with all terms and conditions of his  
7 release to date.

8           The government does not object to this request. Pre-trial Services Officer  
9 Ileen Rodriguez does not object to this request.

10  
11 Dated: August 3, 2023

Werksman Jackson & Quinn LLP

12  
13 By:



14           Mark J. Werksman  
15           Attorney for Defendant  
16           Gary Goulin  
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**DECLARATION OF MARK J. WERKSMAN**

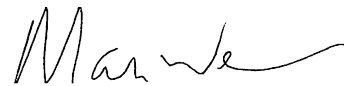
I, Mark J. Werksman, declare as follows:

1. I am counsel of record for defendant Gary Goulin in the case of *United States v. Gary Goulin*, Case Number: 22-CR-00476-MEMF;

2. The facts contained within this Application are true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 3rd day of August, 2023, at Los Angeles, California.



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Mark J. Werksman  
Declarant